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23 UNITED STATES DISTRICT COURT FOR THE
24 CENTRAL DISTRICT OF CALIFORNIA

25 KEVIN SO,

26 Plaintiff,

27 v.

28 LAND BASE, LLC, et al.

Defendants.

)
) CASE NO. CV 08-3336 DDP (AGRx)
)

) **NOTICE OF MOTION AND MOTION FOR**
) **LEAVE TO AMEND COMPLAINT**
)

) **Oral Argument Scheduled**
)

) Date: January 12, 2009
)

) Time: 10:00 a.m.
)

) Place: Courtroom 3 – 2nd Floor
)

) Before: The Hon. Judge Pregerson
)
)

1 Plaintiff Kevin So, by and through counsel and pursuant to Rule 15 of the Federal Rules
2 of Civil Procedure and Rules 15-1 to 15-3 of the Local Rules of the Central District of
3 California, hereby moves the Court to grant Plaintiff leave to file a First Amended Complaint.
4 This motion is supported by the Memorandum of Points and Authorities filed herewith and the
5 proposed First Amended Complaint attached thereto, all pleadings on file in this action, and any
6 oral argument held on this motion.
7

8 A proposed order is filed herewith.

9 Dated: December 18, 2008

KALBIAN HAGERTY, LLP

11 /s/

12 D. MICHELLE DOUGLAS (CA Bar No. 190248)
13 *Counsel for Plaintiff Kevin So*
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CERTIFICATE OF SERVICE

I am employed in the District of Columbia; I am over the age of eighteen years and not a party to the above-entitled action; my business address is 888 17th Street, NW, Suite 1000, Washington, DC 20006.

I hereby certify that on the date set forth below, I electronically filed the foregoing:

1. Notice of Motion and Motion for Leave to Amend
2. Memorandum of Points and Authorities in Support of Motion for Leave to Amend

with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Craig G. Christensen, Esq.
Juris Group, Inc.
1504 Eureka Rd., Suite 390
Roseville, CA 95661

I hereby certify that I will mail the document by U.S. mail to the following non-filing user(s):

Charles Woodhead
25 Nunes Road
Watsonville, CA 95076

Dated: December 18, 2008

KALBIAN HAGERTY, LLP

/s/

D. MICHELLE DOUGLAS (CA Bar No. 190248)
Counsel for Plaintiff Kevin So